

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MICHIGAN**

KELLY KASUL, individually and on behalf of ) all others similarly situated, )  Plaintiff, )	)	Case No. 1:22-cv-00914-HYJ-RSK
vs.	)	District Judge Hala Y. Jarbou
	)	Magistrate Judge Ray Kent
MADAVOR MEDIA, LLC, )  Defendant. )	)	

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**STIPULATION AND (PROPOSED) ORDER FOR EXTENSION OF  
RESPONSE BRIEF DEADLINE**

The parties to this action, Plaintiff Kelly Kasul, individually and on behalf of all others similarly situated (“Plaintiff”), and Defendant Madavor Media, LLC (“Defendant”), hereby stipulate and agree as follows:

1. Plaintiff filed a motion to compel against Defendant on March 15, 2023. (ECF No. 34).
2. On March 16, 2023, the Court entered an Order allowing Defendant’s prior counsel to withdraw as counsel of record. (ECF 38).
3. Defendant retained new counsel, and the new counsel, David W. Centner of Clark Hill, PLC, entered an Appearance on March 28, 2023.
4. Defendant’s deadline pursuant to W.D. Mich. LCivR 7.3(c) to respond to Plaintiff’s motion to compel (ECF 34) is March 29, 2023.
5. As a result of a meet-and-confer session between counsel on March 29, 2023, following the Court’s Status Conference (ECF No. 39), Plaintiff’s counsel agreed to grant

Defendant an extension to April 7, 2023, to respond to Plaintiff's motion to compel. In the meantime, counsel have agreed to work to resolve the discovery dispute.

6. The agreed-to extension, for good cause and subject to approval of the Court, will result in a 9-day extension of the deadline, but Defendant's response will be filed at least 7 days before the scheduled hearing date of April 14, 2023. (ECF No. 42).

WHEREFORE, the parties by counsel hereby stipulate that the Court grant Defendant an extension of time up to April 7, 2023, to file Defendant's response to Plaintiff's motion to compel.

s/ Frank S. Hedin (with permission)

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*Attorneys for Defendant*

### **ORDER**

For good cause shown, and pursuant to the stipulation of the parties, Defendant is hereby granted an extension of time up to April 7, 2023, to file Defendant's response to Plaintiff's motion to compel (ECF No. 34).

**IT IS SO ORDERED.**

March \_\_\_\_, 2023

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Honorable Hala Y. Jarbou